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December 22, 2016

Jeff S. Jordan
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Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188

Dear Mr. Jordan:

In response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT" or the "Complainant"), we write as counsel to DCCC and Kelly Ward in her official capacity as treasurer in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7178, 7179, 7182, 7187, and 7188 (collectively, the "Complaints"); Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer, in MUR 7169; Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7170; Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity as treasurer, in MUR 7171; Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7172; Applegate for Congress and Douglas Applegate, in his official capacity as treasurer, in MUR 7173; Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer, in MUR 7174; Texans for Pete and Wayne Alexander, in his official capacity as treasurer, in MUR 7175; Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7176; Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer, in MUR 7177; Eggman for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7178; Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7179; Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer, in MUR 7182; Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer, in MUR 7187; and LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7188 (collectively, "Respondents" and individually, each a "Respondent").

### INTRODUCTION

These Complaints involve advertisements paid for by the DCCC that supported the election of the named Democratic congressional candidates, and that also opposed the

election, actions, or policies of Donald J. Trump, the Republican candidate for President. The Complaints present three legal issues, none of which is new or complicated: (1) whether the DCCC properly attributed the costs of the advertisements among the multiple candidates appearing in them according to 11 C.F.R. § 106.1(a); (2) whether the DCCC correctly accounted for the portion of the expenses attributed to Donald Trump; and (3) whether the DCCC and the congressional campaigns refrained from coordinating the ads with Hillary for America ("HFA"), so that none of their costs would represent in-kind contributions to HFA.

Because the answer to each of these questions is yes, there is no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act") or the regulations of the Federal Election Commission (the "FEC" or "Commission"):

First, the DCCC followed the process mandated by Commission regulations and long-standing Commission authority and attributed the cost of the advertisements among the multiple candidates appearing in them on a time-space basis, "according to the benefit reasonably expected to be derived." The Complaints ignore clear Commission authority requiring attribution among multiple candidates in this case of advertisements like these and present no facts to show that any attribution was done incorrectly. Instead, relying solely on one inaccurate news article, they simply assume that the advertisements were misattributed under the concept of "hybrid advertising" based on a generic party reference, which was not the case.<sup>2</sup> These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

Second, the facts show that the DCCC correctly accounted for and reported the expenses attributable to Donald Trump. Some of the advertisements expressly advocated Trump's defeat, while others did not. The first were reported as independent expenditures. while the second were not, according to the Act and Commission regulations.<sup>3</sup>

Moreover, as a national party committee, the DCCC had an interest both in urging Donald Trump's defeat and criticizing his policies, above and beyond its central mission of supporting House candidates. Donald Trump was at the top of the ticket and the face of the Republican Party. He advocated policies and took actions strongly opposed by Democratic Party adherents. By expressly advocating Donald Trump's defeat, and by criticizing policy positions he espoused, that were strongly identified with him in the public mind, the DCCC alternatively promoted his defeat and mobilized Democratic opposition to his policies, the latter of which also helped support the ticket as a whole.

Third, none of the advertisements at issue was coordinated with HFA. In fact, the DCCC and campaigns took specific steps to avoid coordination with HFA. The Complaints present no facts to support any claim of coordination, but simply assume that it must have

<sup>111</sup> C.F.R. § 106.1(a)(1).

See Scott Bland, Dems use loophole to pump millions into fight for the House, Politico, Oct. 18, 2016, http://www.politico.com/story/2016/10/democrats-house-campaign-money-229957.

3 See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

occurred because a party committee was involved in the advertisements—a presumption that the Supreme Court struck down long ago.<sup>4</sup>

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters. FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

The Respondents complied with longstanding Commission regulations to support and oppose multiple candidates and promote the party as a whole. Because the costs were correctly attributed among multiple candidates, because the ads were correctly reported, and because there was no prohibited coordination with HFA, there is no reason to believe that any violation occurred, and the FEC should immediately dismiss these Complaints.

### **FACTS**

The DCCC is the House campaign committee of the Democratic Party. Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.

The presidential candidacy of Donald Trump provided the DCCC with a unique opportunity to promote Democratic House candidates, oppose Trump's election, and mobilize the Democratic Party against Trump's positions for the benefit of the whole ticket. Trump was a major issue in House campaigns, his defeat was a vital concern for Democratic adherents, and fighting back against his policy positions and actions was important to the party as a whole. The DCCC saw the opportunity to pursue all three of these objectives.

<sup>&</sup>lt;sup>4</sup> See Colorado Republican Fed. Campaign Comm. v. FEC, 518 U.S. 604, 614-15 (1996) (invalidating prohibition on party independent expenditures); McConnell v. FEC, 540 U.S. 93, 214 (2003), overruled in part on other grounds by Citizens United v. FEC, 558 U.S. 310 (2010) (invalidating requirement that party choose between making independent or coordinated expenditures).

<sup>&</sup>lt;sup>5</sup> See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

<sup>&</sup>lt;sup>6</sup> See, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

<sup>&</sup>lt;sup>1</sup> See, e.g., FEC Advisory Opinion 1985-14 (DCCC).

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase. Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182. 10
- other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits. The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump's defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188.

In all of these advertisements, the DCCC attributed the relevant expenses between the referenced candidates—i.e., the House candidate and Donald Trump—on a time/space basis,

<sup>&</sup>lt;sup>8</sup> See Exhibit A (affidavit of Michael Ian Russell)..

<sup>&</sup>lt;sup>9</sup> See Exhibit B (relevant pages of FEC reports).

The advertisement in MUR 7169 can be found here: <a href="https://www.youtube.com/watch?v=71mb2DsowG00">https://www.youtube.com/watch?v=71mb2DsowG00</a>. The advertisement in MUR 7170 can be found here: <a href="https://www.youtube.com/watch?v=ukmwN?ivMU">https://www.youtube.com/watch?v=ukmwN?ivMU</a>. The advertisement in MUR 7171 can be found here: <a href="https://www.youtube.com/watch?v=g.4kBjw8r-U">https://www.youtube.com/watch?v=g.4kBjw8r-U</a>. The advertisement in MUR 7176 can be found here: <a href="https://www.youtube.com/watch?v=WCx3ObETyrE">https://www.youtube.com/watch?v=WCx3ObETyrE</a>. The advertisement in MUR 7182 can be found here: <a href="https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be">https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be</a>.

II See Exhibit B.

<sup>&</sup>lt;sup>12</sup> The advertisement in MUR 7172 can be found here: <a href="https://www.youtube.com/watch?v=nwdliKSaFdQ">https://www.youtube.com/watch?v=nwdliKSaFdQ</a>. The advertisement in MUR 7175 can be found here: <a href="https://www.youtube.com/watch?v=GJCZwJ3tYXw">https://www.youtube.com/watch?v=GJCZwJ3tYXw</a>. The advertisement in MUR 7177 can be found here:

https://www.youtube.com/watch?v=7KxcnuejChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youtube.com/watch?v=HIxNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=OpdllznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=opfwW3WyOWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

determining the portion of each ad that related to each candidate and allocating accordingly. As mentioned above, two of the Complaints involved ads that were paid for entirely with campaign funds, and with DCCC funds used under the coordinated party expenditure limit.<sup>13</sup>

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. <sup>14</sup> Because the ads would refer to Trump. the staff and campaigns were instructed not to coordinate them with HFA or its agents. 15 The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent, substantial discussion or material involvement. 16 The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. 17

### **LEGAL ANALYSIS**

- L. The Costs of the Advertisements Were Properly Attributed Among Multiple Candidates According to the Benefit Reasonably Expected to Be Derived
  - A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived." For a television ad, the regulation is explicit about how to make this attribution: it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates.<sup>26</sup> For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate).<sup>21</sup> The portions of the broadcast communication that is dedicated to the legally

<sup>13</sup> The advertisement in MUR 7173 can be found here: https://www.youtube.com/watch?v=Rrii1jNAe-I. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DNOEgLEECA. See Exhibit

B.

14 See Exhibit A.

<sup>16</sup> Id.; see also Exhibit C (affidavit of media vendors).

<sup>&</sup>lt;sup>17</sup> The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C. <sup>18</sup> 11 C.F.R. § 106.1(a). <sup>19</sup> *Id*.

<sup>&</sup>lt;sup>20</sup> See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) ("attribution shall be determined by the proportion of space devoted to each candidate") (citing 11 C.F.R. § 106.1(a)(1)). <sup>21</sup> FEC Adv. Op. 2010-10 (NRL PAC).

required disclaimer and "stand by your ad" messages do not count for either candidate, but rather are split proportionately to the rest of the communication's content.<sup>22</sup>

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate." Still, the Commission confirmed that the costs of the communication must be attributed between the two campaigns based on the proportion of space or time devoted to each candidate under 11 C.F.R. § 106.1(a), even though the ad expressly advocated one candidate's election and not the other's. Similarly, in Advisory Opinion 2010-10, the Commission held that when a broadcast communication expressly advocated the election of one candidate, referred to an opposing candidate without expressly advocating defeat, and expressly advocated the election of a third candidate in an altogether different race, the references to the opposing candidate would be attributed to the first candidate under 11 C.F.R. § 106.1(a).

The Commission has applied section 106.1's attribution principles even when only one candidate is referenced but the ad concerned multiple purposes. For example, in Advisory Opinion 2004-29, the Commission allowed Representative Todd Akin to appear in an ad supporting a ballot issue committee, but advised his campaign only to "reimburse the sponsor of the advertisement for the attributable portion of the cost of these coordinated communications," despite the fact that no candidate besides Akin would appear in the ad. And in Advisory Opinion 2006-11, the Commission considered a state party mailing that would expressly advocate for a federal candidate and for other generically referenced candidates of the party committee. The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived' by the clearly identified candidate should be

<sup>&</sup>lt;sup>22</sup> Specifically, the Commission has advised that the disclaimer component of the communication should be attributed among the candidates or purposes "in the same proportion as the time or space" devoted to each race or purpose. FEC Adv. Op. 2010-10 (NRL PAC) at 6; see also FEC Adv. Op. 2007-09 (Kerry-Edwards) (permitting disclaimer to be attributed among multiple purposes). For instance, in NRL PAC, the FEC stated that, where 16 seconds of a 30-second advertisement are devoted to advocating for a presidential candidate, 8 seconds are devoted to advocating against a Scnate candidate, and 6 seconds are devoted to a disclaimer, two-thirds of the expenditure should be reported as having been made in support of the presidential candidate and one-third should be reported as having been made in opposition to the Senate candidate. FEC Adv. Op. 2010-10 at 6 n.7. In Kerry-Edwards, the Commission found that the portion of broadcasting costs incurred by the Kerry-Edwards Campaign in complying with disclaimer requirements were expenses that may be paid for with legal funds. See FEC Adv. Op. 2007-09.

<sup>23</sup> FEC Adv. Op. 2004-01 (Bush/Kerr).

<sup>&</sup>lt;sup>24</sup> Id. at 6. The Commission has since adopted a specific exemption from the coordination rules that vitiates the general attribution rule in the case of certain "endorsement" ads. See 11 C.F.R.§ 109.21(g). However, that exception is not at issue in these matters.

<sup>&</sup>lt;sup>25</sup> FEC Adv. Op. 2010-10 (NRL PAC).

<sup>&</sup>lt;sup>26</sup> FEC Adv. Op. 2004-29 (Akin) at 6.

<sup>&</sup>lt;sup>27</sup> FEC Adv. Op. 2006-11 (Washington Democratic State Central Committee).

measured by determining the amount of space devoted to the clearly identified candidate as compared to the amount of space devoted to the generically referenced party candidates."28

Although the ads aired by Respondents are not so-called "hybrid" ads like those in Advisory Opinion 2006-11, the Commission has nonetheless found that ads that concern candidates, issues, and the party generally are allocated just like ads that concern multiple candidates. The Act "generally permit[s] (and in some cases require[s]) the allocation of expenses attributable to more than one purpose" and "allocation is an appropriate way to fund activities with multiple purposes" as held over and over by the Commission.<sup>29</sup> These ads that— in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump's defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

#### B. Respondents attributed the advertisements correctly.

The advertisements in MURs 7169, 7170, 7171, 7172, 7174, 7175, 7176, 7177, 7178, 7179, 7182, and 7188 were all correctly attributed among the Democratic House candidates and Donald Trump, just as 11 C.F.R. § 106.1(a) and Commission authority contemplate. The plain language of 11 C.F.R. § 106.1(a) requires that when an expenditure for a broadcast communication clearly identifies more than one Federal candidate, the costs shall be attributed as determined by "the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates." The FEC has additionally confirmed that when an advertisement mentions two opponents running for the same office and a third candidate for a different office, the costs are "allocated among the electoral races, based on a time or space analysis."30 This is how Respondents attributed the costs of these advertisements in this case.

All of the ads at issue referred to clearly identified House candidates and Donald Trump, a clearly identified presidential candidate running. The portions of the ads that were spent discussing the House candidates were attributed to the Democratic House candidate. Conversely, the portions of the ads that were spent discussing Trump were attributed to Trump. If a portion of an ad concerned both the House candidate and Trump, that period of time was attributed between the two races on a reasonable basis. The portion of each ad that was spent displaying the written, visual, and spoken disclaimer as mandated by law was allocated between the two races "in the same proportion as the time or space" devoted to each race in the other portions of the ad, just as the Commission instructed in Advisory Opinion 2010-10.

<sup>&</sup>lt;sup>29</sup> See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities); see also FEC Adv. Op. 1988-06 (Gore for President) (holding that "expenditures within the purview of the Act may be made for multiple purposes [and] the Commission believes that expenditures to run an advertisement which includes a fundraising solicitation may be allocated on a 'reasonable basis'"); First General Counsel's Report at 22. FEC Matter Under Review 4131(holding that multi-purpose mailers that include express advocacy of candidates and a solicitation for contributions to a state PAC should be allocated between the mixed purposes). <sup>30</sup> FEC Adv. Op. 2010-10 (NRL PAC).

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.31 The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

Consider also the ad sponsored by the DCCC and Colleen Deacon for Congress at issue in MUR 7172.<sup>32</sup> The ad critiques the positions of both Rep. John Katko and Donald Trump, but does not expressly advocate Trump's defeat. The ad starts with approximately 4 seconds equally attributable to both the House race and Trump and is followed by 2.5 seconds attributable to Trump, 3.5 seconds attributable to the House race, 8 seconds attributable to Trump, 7 seconds attributable to the House race, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

#### C. The expenses attributed to the House candidates were correctly reported.

The portion of the ads attributable to the House candidates were paid for and reported as required by the Act and Commission regulations. In almost every case, and as reported to the Commission, the relevant Democratic House campaign directly paid the relevant media vendor for its attributable portion of the costs. In two cases—the ad sponsored by the DCCC and Nelson for Wisconsin in MUR 7171, and the ad sponsored by the DCCC and Shkreli for Congress in MUR 7176—the DCCC paid for some of the portion of the expenses that were attributable to the House campaign as a coordinated expenditure. For the Nelson campaign, the DCCC paid \$33,700 of the costs attributable to the campaign, and for the Shkreli ad, the DCCC paid \$52,960. These payments were well within the DCCC's coordinated party expenditure limits for each race and were reported to the Commission.<sup>33</sup> The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

<sup>&</sup>lt;sup>31</sup> Jim Mowrer, *Now We Understand*, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g\_4kBjw8r-U. <sup>32</sup> Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0. <sup>33</sup> See Exhibit B.

that is attributable to the relevant candidate under 11 C.F.R. § 106.1(a), no contribution results from the payment of the remaining portion of the expenses for the advertising.<sup>34</sup>

Contrary to FACT's speculative and unfounded allegations, the DCCC did not make any excessive contributions to any of the House campaigns, because the expenses attributable to those campaigns were either paid for by the campaigns themselves, or by the DCCC under its coordinated expenditure authority.

D. Two of the communications at issue were paid for entirely by the House campaigns and the DCCC as coordinated party expenditures.

For reasons known only to FACT, that organization filed two complaints regarding ads paid for entirely by the relevant Democratic House campaign and under the DCCC's coordinated party expenditure authority. Given the way that they were funded, these expenditures for these ads cannot possibly amount to excessive contributions from the DCCC to the House campaign. MUR 7173 concerns an ad sponsored by the DCCC and Applegate for Congress. The DCCC spent a total of \$91,200 to assist in the airing of this ad and Applegate for Congress paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward the ad were treated as coordinated party expenditures and reported accordingly.<sup>35</sup>

Similarly, MUR 7187 concerns an advertisement sponsored by the DCCC and Friends of Christina M. Hartman. The DCCC spent a total of \$96,070 to assist in the airing of this ad and Friends of Christina M. Hartman paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward this ad were treated as coordinated party expenditures and reported accordingly.<sup>36</sup>

Thus, in MURs 7173 and 7187, not even the question of attribution was present. At no point was there any basis for FACT to allege any violation of the limits as to the House campaigns.

## II. The Portions of the Ads Attributable to Donald Trump Were Correctly Reported

Except in MUR 7177, the portions of the ads referenced by the Complaints and attributable to Donald Trump were paid for by the DCCC. In MUR 7177, the portion of the ad attributable to Trump was paid for by the Colorado Democratic Party. In each case, the party committee either filed the necessary independent expenditure report as to Trump or

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<sup>&</sup>lt;sup>34</sup> See FEC Adv. Op. 2004-37 (Waters) at 2 (holing that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin).

<sup>35</sup> See Exhibit B.

<sup>&</sup>lt;sup>36</sup> *Id*.

reported the attributable portion of the ad as operating expenditures, depending on whether the ad contained express advocacy.

To be an independent expenditure, a communication must include "express advocacy" for or against a "clearly identified" candidate.<sup>37</sup> However, although all of the relevant ads "clearly identified" Trump under 11 C.F.R. § 100.17, only the ads at issue in MURs 7169, 7170, 7171, 7174, 7176, and 7182 included "express advocacy" against him.<sup>38</sup> In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.<sup>39</sup>

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure. 40

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate. A message constitutes express advocacy "only if it contains a clear call to a specific electoral

<sup>&</sup>lt;sup>37</sup> 11 C.F.R. § 100.16.

<sup>&</sup>lt;sup>38</sup> Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), <a href="https://www.youtube.com/watch?v=7mb2DsowG00">https://www.youtube.com/watch?v=7mb2DsowG00</a>; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"),

https://www.youtube.com/watch?v=ulkmwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vm9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g. 4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

<sup>&</sup>lt;sup>39</sup> See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication").

<sup>40</sup> See, e.g., FEC Adv. Op. 1985-14 (DCCC).

<sup>&</sup>lt;sup>41</sup> 11 C.F.R. § 100.22.

action."<sup>42</sup> Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

Speech cannot be "express advocacy of the election or defeat of a clearly identified candidate" when reasonable minds could differ as to whether it encourages a vote for or against a candidate or encourages the reader to take some other kind of action. We emphasize that if any reasonable alternative reading of speech can be suggested, it cannot be express advocacy subject to the Act's disclosure requirements. 43

Even by this broad standard, the advertisements at issue in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not include any words of express advocacy regarding Trump. In each case, a reasonable alternative reading exists for the communication as it pertains to Trump, insofar as they criticize his policy positions and their negative effects.

Several of the advertisements discuss Republican congressional candidates "support" for Donald Trump's positions. For example, in the advertisement at issue in MUR 7172 the script is as follows:

VOICE OVER: In an unsettled world, John Katko and Donald Trump's approach takes us down a dangerous path. [Showing footage of global unrest].

TRUMP: "I love war in a certain way."

VOICE OVER: But when asked about supporting Trump, Katko said ...

KATKO: "I absolutely will support."

TRUMP: "Tell them to go f--- themselves."

VOICE OVER: When national security leaders condemn Trump's reckless statements on foreign policy...

INTERVIEWER: "People are wondering how those things can happen and you not flat out denounce it?"

KATKO: "I'm more concerned about my race."

VOICE OVER: Not about the safety of our families. Trump and Katko put our national security at risk.

[DISCLAIMER].44

Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

43 FEC v. Furgatch, 807 F.2d 857, 864 (9th Cir. 1987).

<sup>44</sup> Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToIp3Br0.

However, the word "support" in this context cannot only be interpreted as a call to vote against Donald Trump. Rather, it is intended to critique Donald Trump's desire for war, dangerous foreign policy "approach," and other previous actions and policy positions and Representative Katko's support of Trump despite these positions. This advertisement concludes with the statement that "Trump and Katko put our national security at risk." The advertisement does not say that viewers should vote against Donald Trump for President but refers to the contemporaneous actions of both Representative Katko and Donald Trump that are adverse to the United States' national security interests.

Similarly, consider the advertisement at issue in MUR 7175. The script of advertisement is as follows:

TRUMP: We're going to build a wall.

VOICE OVER: Donald Trump is tearing us apart. [SHOWING CURRENT NATIONAL UNREST]. Trump called a judge unqualified because of his Mexican heritage.

TRUMP: He's a Mexican. We're building a wall between here and Mexico.

VOICE OVER: And called Mexicans rapists and murderers. Donald Trump. Too dangerous for us. But Will Hurd says he could still support Donald Trump. And Will Hurd shares the same bad ideas.

WILL HURD: A wall absolutely makes sense.

VOICE OVER: Will Hurd. He's the wrong choice for Texas families.

[DISCLAIMER].45

This advertisement refers to several statements and policy positions of Donald Trump and observes the contemporaneous effects: his positions and actions are "tearing us apart" at this time. The advertisement does not include a call to defeat Donald Trump in the presidential election, but it does include a call to defeat Representative Hurd: it says that he is the "wrong choice for Texas families" because of his support of Donald Trump's positions. Citing Representative Hurd's support for Donald Trump as a reason to defeat Representative Hurd is not express advocacy with regard to Donald Trump. There is no portion of the advertisement that could only be interpreted as a call to vote against Donald Trump and thus the advertisement does not contain express advocacy against Donald Trump as defined at 11 C.F.R. § 100.22. As there is no "express advocacy" or "clear call to a specific electoral action" with regard to Donald Trump in any of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188, no portion of any of these advertisements should have been reported as independent expenditures opposing Donald Trump.

<sup>45</sup> Wrong Choice for TX Families, YouTube (Oct. 4, 2015), https://www.youtube.com/watch?v=GJCZwJ3fYXw.

Because the portion of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188 attributable to Donald Trump did not contain express advocacy opposing Trump, they were properly reported by the DCCC and Colorado Democratic Party as operating expenditures. The Commission's regulations and previous decisions are clear: if a party committee airs a communication that does not constitute an independent expenditure or party coordinated communication, the expenses associated with the advertisements, or relevant portions thereof are operating expenditures.<sup>46</sup>

### III. The Complaint Presents No Genuine Allegation of Coordination with HFA, and The Facts Demonstrate That None Occurred

None of the relevant advertisements was coordinated with HFA. There was no coordination between the Respondents on the one hand, and HFA on the other, regarding any of the advertisements cited by the Complaints. None of the Complaints alleges any specific facts that could even be taken to suggest coordination.<sup>47</sup>

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act. For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are *not* sufficient to find reason to believe that Respondents violated the Act through impermissible coordination. Because the Complaints rely exclusively on pure speculation and unwarranted legal conclusions for their coordination claims, there is no reason to believe any coordination occurred.

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads. 51 The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important. 52 Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

<sup>&</sup>lt;sup>46</sup> FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

<sup>47</sup> See Exhibit A.

<sup>&</sup>lt;sup>48</sup> Statement of Reasons, Commissioners Mason, Sandstrom, Smith, and Thomas, MUR 4960 (Dec. 21, 2001).

<sup>&</sup>lt;sup>49</sup> FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009).

<sup>&</sup>lt;sup>50</sup> FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000). <sup>51</sup> See Exhibits A and C.

<sup>52</sup> See Exhibit A.

communications with HFA regarding the ads; and that he knows of no deviation from these instructions.<sup>53</sup>

Because the Complaints rely entirely on speculation to mount the claim of coordination, and because Respondents have provided compelling evidence to refute this speculation even when not required to do so, the Commission should dismiss these baseless claims.

### **CONCLUSION**

The FACT complaints are based completely on an incorrect factual assumption and a blatant misunderstanding of the law. FACT assumed that the Respondents were allocating the advertisements at issue according to the Commission's guidance on generic party hybrid advertising and apparently believe that such hybrid advertising is the only case in which a committee should allocate an advertisement between multiple federal candidates or purposes. In reality, the Commission's regulations provide for the attribution of any communication that concerns multiple Federal candidates. The Respondents followed the Commission's attribution regulations here, and paid for and reported each portion of the advertisements according to the requirements of the Act.

There is absolutely no merit to the allegations in any of the complaints in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 and the Commission should dismiss all of these complaints against all of the Respondents immediately.

Very truly yours,

Marc E. Elias

Brian G. Svoboda

Graham M. Wilson

Rachel L. Jacobs

**Enclosure** 

Counsel to:

**DCCC** 

Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity, as treasurer Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer Applegate for Congress and Douglas Applegate, in his official capacity as treasurer

<sup>&</sup>lt;sup>53</sup> Id.

Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer Texans for Pete and Wayne Alexander, in his official capacity as treasurer Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer Eggman for Congress and Jay Petterson, in his official capacity as treasurer Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer

LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer

## Exhibit A

### BEFORE THE

### FEDERAL ELECTION COMMISSION

### DECLARATION OF MICHAEL IAN RUSSELL

- I, Michael Ian Russell, do declare and state as follows:
  - 1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
  - 2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169; (b) Ruben Kihuen for Congress on the advertisement discussed in the complaint in MUR 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR. 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for Iowa on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MUR 7176 (j) Carroll for Colorado on the advertisement discussed in the complaint in MUR 7177 (k) Eggman for Congress on the advertisement discussed in the complaint in MUR. 7178 (1) Murphy for Congress on the advertisement discussed in the complaint in MUR 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuAnn Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
  - 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
  - 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DCCC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

ï

- 5. I instructed my staff working on the Advertisements and the staff of Campaigns involved with the Advertisements not to discuss any aspect of these Advertisements with HFA or its agents. Likewise, my staff and the Campaigns were instructed not to have any involvement with HFA or its agents with regard to these Advertisements. I am not aware of any breach of or deviation from this protocol.
- 6. To the best of my knowledge, and consistent with the instructions I gave, these Advertisements were developed internally at DCCC in coordination with each Campaign without any communication with or from Hillary for America or its agents. Likewise, to the best of my knowledge, none of the Advertisements were created, produced, or distributed at the suggestion or request of HFA or its agents nor did they assent to the creation, production, or distribution of any of the Advertisements.
- 7. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had any involvement with HFA or its agents regarding any Advertisement in any way, including, but not limited to:
  - i. the content of any Advertisement;
  - ii. the intended audience for any Advertisement;
  - iii. the means or mode of any Advertisement;
  - iv. the specific media outlet used for any Advertisement;
  - v. the timing or frequency of any Advertisement; or
  - vi. the duration of any Advertisements.
  - 8. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had discussions about with HFA or its agents about any Advertisement or HFA's plans, projects, activities, or needs with regard to any Advertisement. Neither HFA nor its agents conveyed to me, and to the best of my knowledge to any DCCC employee or Campaign staff working on these Advertisements, any relevant information about HFA's plans, projects, activities; or needs concerning any Advertisement.
  - 9. To the best of my knowledge, no DCCC employee or Campaign staff working on these Advertisements was employed by HFA at any time during the 120 days prior to the date that each Advertisement was aired.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2/4 day of December, 2016.

# Exhibit B

### lmage# 201512089039916605

# SCHEDULE F. (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

PAGE 109105 OF 109107

(То в	e used onl	y by Po	litical Com	nittees in the Geni	eral Election	) FOR L	INE 25	OF FORM 3X
NAME OF COMMITTEE (In Full)								
DCCC .								
Has your committee been designated to make		1		ordinate Committee				
coordinated expenditures by a political party of	commillee?	{	occc					•
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Democratic National Committe	e &			2nd Floor .				
Pennsylvania Democratic Party	y	City	ington			Siate DC	1 " "	Codo 3-4024
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### SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR	R FED	ERA	L OFFIC	E		PAGE	47529	OF 47535
(To be us	sed only	by Po	litical Com	mittees in the Gen	eral Election	) FOR L	INE 25	OF FORM 3X
NAME OF COMMITTEE (In Full)						<del></del>		<del></del>
DCCC								
Has your committee been designated to make		Full N	ame of Sub	ordinate Committee	<del></del>	<del> </del>		
coordinated expenditures by a political party com	miltee?	1	DCCC	•				
YES NO								
If YES, name the designating committee:	_	Mailin	g Address	430 South Capitol	Street, SE			
Democratic National Committee 8	Š.	Cliv	<u>-:</u>	2nd Floor		State		7-4-
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# SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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(To be used only by Political Committees in the General Election)									INE 25 OF FORM 3X
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coordinated expenditures by a political party committee? DCCC									•
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	City Alexandria		State VA		Zip Code 22314		10	24	2016
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### SCHEDULE F (FEC Form 3X)

# ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR FEDI	ERAL OFFICE	PAGE 47535 OF 47535
(To be used only	by Political Committees in the Gene	rai Election) FOR LINE 25 OF FORM 3X
NAME OF COMMITTEE (In Full)		
DCCC		
Has your committee been designated to make -	Full Name of Subordinate Committee	
coordinated expenditures by a political party committee?    X YES   NO	DCCC	
If YES, name the designating committee:	Mailing Address 430 South Capitol S	Street. SE
Democratic National Committee	2nd Floor	
	City Washington	State   ZIP Code   DC   20003-4024
Full Name (Last, First, Middle Initial) of Each Payee	☐ Memo Item	Purpose of Expenditure
Buying Time, LLC		Media Services
		Category/
Mailing Address 650 Massachusetts Avenue, NW Suite 210		Date Type
City State	Zip Code	Waw Local Last Last
Washington DC Name of Federal Candidate Supported   Office South		10 11 2016
Name of Federal Candidate Supported   Office Sough	It: K House State: WI District: 08	Amount
	Presidential	32700.00
Aggregate General Election	32700,00	
Expenditure for this Candidate	32700.00 tion ID : SF-951664	
Full Name (Last, First, Middle Initial) of Each Payee	☐ Memo Item	Purpose of Expenditure
Adelstein & Associates LLC		Media Services
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Schneider, Bradley, Scott,	T: X House State: IL District: 10	Amount
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### SCHEDULE F (FEC Form 3X)

### ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE PAGE 83515 OF 63518 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC C

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	i		i	Presidential			_	, ,	91200.00
Aggregate General Election						]	ī	,	•
Expenditure for this Candidate	•			91200	•				
	T	ransact	don (C	SF-949904	l				
Full Name (Last, First, Middle Initial) of	Each P	ayee			Memo Item		Expenditure	-	
Screen Strategies Med	lia. Ll	LC				Media S	ervices		ŀ
					·	ļ			Category/
Mailing Address 11150 Fairfax B	lvd								Ţÿpä
Suite 505		Tours		12:- 0-40	<del></del>	Date			
City		State		Zip Code		09	23		2016
Fairfax Name of Federal Candidate, Supported	Oile	Sough	. · .	22030	i Chatai CA				
		Sougn	t: A	House Senale	State: <u>CA</u> District: 25	Amount			-
Caforio, Bryan,	;		• •	Presidential	District			•	46490.00
<u></u>				1 163/GCTIBOI	•	1	1	•	40-30:00
Aggregate General Election  Expenditure for this Candidate ▶				96200	r00				
Transaction	n ID :	sF-9500	114	•			-		
Full Name (Last, First, Middle Initial) of	Each F	ayee			: Memo Item	Purpose of	Expenditure		<u> </u>
Screen Strategies Media, L		•			-	Media S	ervices		ľ
						<u>.</u>			Category/
Mailing Address 11150 Fairfax Blvd								<u>:        </u>	'Type
Suite 505				·		Date			
City		State		Zip Code		. " "	28	4	40
Fairfax	<u>.                                     </u>	VA		22030		09	20	20	16
Name of Federal Candidate Supported	Office	Sough	t: ×,	House	State: <u>CA</u>	Amount			. <del></del>
Caforio, Bryani			;	Senate	District: 25				
<u></u>		_ <del>.</del>		Presidential	1	ł	,	, 1	13431.04
Aggregate General Election				96200	00	ļ			
Expenditure for this Candidate	_	1		•	.00	1			
<u></u>	Trans	action i	D : SF	-950737	·				
4155555								16	51121.04
UBTOTAL of Expenditures This Page (op	ucnal)		•••••				•	, "	
OTAL This Paried dust are a district	, 				_				
OTAL This Period (last page this line num	rder of	11 <b>y)</b>					•	•	

## Exhibit C

# BEFORE THE FEDERAL ELECTION COMMISSION

### **DECLARATION OF MAURA JOHNSON - MUR 7179**

- 1, Maura Johnson, do declare and state as follows:
  - During the 2016 election, as a Media Supervisor at GMMB, Inc. ("GMMB"), I provided
    media buying services for Ralston Lapp Media, the consultant working with Stephanie
    Murphy for Congress. Through that position, I am familiar with the matters discussed
    herein.
  - 2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
  - 3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
  - 4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
  - 5. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:

الماء الماء الماء

- i. the content of the Advertisement;
- ii. the intended audience for the Advertisement:
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had discussions with HFA or its agents about the Advertisement.
- 7. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used information previously used by GMMB in providing services to HFA in relation to the distribution of the Advertisement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 31 day of December, 2016.

Maura Johnson

### BEFORE THE

### FEDERAL ELECTION COMMISSION

## DECLARATION OF DAVID DIXON AND RICHARD DAVIS, DIXON/DAVIS MEDIA GROUP LLC - MUR 7188

David Dixon and Richard Davis do declare and state as follows:

- During the 2016 election, we were partners at the Dixon/Davis Media Group LLC
   ("Dixon/Davis"). Through that position, we are familiar with the matters discussed
   herein.
- At the request of DCCC, and with the guidance of DCCC and their legal counsel,
   Dixon/Davis worked with DCCC and LuAnn Bennett for Congress to create, produce,
   and distribute an advertisement discussed in the complaint in FEC Matter Under Review
   7188 (the "Advertisement").
- 3. Dixon/Davis worked for Hillary for America ("HFA") during the 2016 election cycle.
- 4. To the best of our knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
- 5. To the best of our knowledge, no employee or agent of Dixon/Davis working on the

  Advertisement had any involvement with HFA or its agents regarding the Advertisement
  in any way, including, but not limited to:
  - i. the content of the Advertisement;

- ii, the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.
- 7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this **22** and day of December, 2016.

David Dixor

Richard Da

## Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 9 OF 8 FOR SE OF FORM 24/48
NAME OF COMMITTEE (in Full)	FEC IDENTIFICATION NUMBER Y
DCCC	C1 C00000935
	1C1 C0000936
Check if 24-hour report  48-hour report  New report  Armends of	eport filed on
Full Name of Payee	Date of Public Distribution/Dissemination
Old Towne Media Date of Dissemination: 10/19/16	10 19 2016
Mailing Address 4507 Penwood Dr	السعادة المساء المساء
· I	Amount
City State Zip Code	48005.00
Alexandria • VA 22310	Transaction ID : SE-952383  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type	04 10 18 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date	Disbursement For: Primary General
Per Election for Office Sought	2016 Other (specify)
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media, LLC Date of Dissemination: 10/19/16	10 19 2016
Mailing Address 222 West Onterio West	
Suite 600	Amount
City State Zip Code	81321.00
Chicago IL 60854	Transaction ID: SE-952887  Date of Disbursement or Obligation
Purpose of Expenditure  Media Buy  Category/  Type  O  Category/	H 10 14 2016
Type	المستنسا ليتسا ليشا
Name of Federal Candidate Support	Office Sought: House District 00
Oonald J. Trump	President Senate State:
Calendar Year-To-Date	Disbursement For: Primary General 2016
Per Election for Office Sought 2742321.20	Other (specify)
	part & state or as to confine the confine the state of the
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
	En elle state franch marie trademistration made
(b) SUBTOTAL of Unitemized Independent Expenditures	to a second
(c) TOTAL independent Expenditures	273146.39
	b - 0 1 de de constant des de
Under penalty of perjury I certify that the independent expenditures reported herein we with, or at the request or suggestion of, any candidate or authorized committee or agen party committee) any political party committee or its agent.	ere not made in cooperation, consultation, or concert in of either, or (If the reporting entity is not a political
Kelly C. Ward	ate 10 21 2016
Signature	ate in 21 2010

	REPORT OF INDEPE	NDENT EXPEND	ITURES			PAGE 48	OF 60
(Schedule E)							F FORM 24/48
NAME OF COMM	ITTEE (In Full)				FEC I	DENTIFICATI	ON NUMBER V
DCCC					C	C00000935	
Check if    24-	hour report [] 48-hour rep	ort New rep	ort Amends repo	ort filed	on [a n]	1000	444444
Full Name of Screen S	Payas Strategies Media, LLC						/Dissemination
Maille Add	Date of Dissemir	nation: 10/24/16			10	24	2016
Maining Addre	55 11150 Fairfax Bivd Suite 505				Amount		
City	<del></del>	State	Zip Code		!	_ ,	45000.00
Fairfax		VA	22030		Transaction Date of Disbu		
Purpose of E Media Buy	penditure		Category/ Type 004	7	10	· [ ] ·	2016
Name of Fed	eral Candidate		Support	Office	Sought:	House	District:00
Donald J. Tru	mp		Oppose	X	President	Senate	State:
	Year-To-Date tion for Office Sought	36 36 36	553174.61	Disbu/ 2016	sement For:	Primar	General
Full Name of		<del> </del>			Date of Publi	c Distribution	/Dissemination
AL Media	LLC Date of Dissemir			.	10.07	10203	LASTA ASSA
Mailing Addre		144011. 10/24/10			10_	24	2016
	Suite 600			ı	Amount		
City	Suite 600	State	Zip Code				131250.00
Chicago		IL .	60654		Transaction II Date of Disbu	D: SE-95318 ursement or	7
Purpose of E Media Buy	xpenditure		Category/ Type 004		10	21	2016
Name of Fed	eral Candidate		Support	Office	Sought:	House	District: 00
Donald J. Tru	mp		Oppose	X	President	Senate	State:
	Year-To-Date tion for Office Sought		3653174.61	Oistur 2016	sement For:	Primary	General
					I'-! Outer (at	DECITY)	
(a) SUBTOTAI	of Itemized Independent Exp	enditures		<b>.</b> .	·	,	176250,00
(b) SUBTOTAL	. of Unitemized Independent E	xpenditures	***************************************	·· •		بر . <del>سپس</del> وب الصادب	
(c) TOTAL Ind	ependent Expenditures		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	" <b>&gt;</b>			
with, or at the	of perjury I certify that the inc request or suggestion of, any o) any political party committee	candidate or authorized					
K	elly C. Wend				n	A ERWES	-33-I
Signature	- · · · · · · · · · · · · · · · · · · ·		Date	10	25	201	6

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 51 OF 60
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y
DCCC	C1 C00000935
Check If 24-hour report 48-hour report New report Amends report fil	led on [","   10,4,0] , [A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.A.
Full Name of Payee AL Media LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/25/16  Mailing Address 222 W Onterio St	10 25 2016
Suite 600	Amount
City State Zip Code	900,00
Chicago IL 60654	Transaction ID : SE-953228 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	10 24 2016
Name of Federal Candidate Support Offi	fice Sought:   House District: 00
Donald J. Trump	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  A369947.93  Ois 201	sbursement For: ☐ Primary ☐ General  16 ☐ Other (specify) ▶
Full Name of Payes	Date of Public Distribution/Dissemination
Canal Partners Media, LLC Date of Dissemination: 10/25/16	10 25 2016
Mailing Address 25 Whitlock Piece	Amount
Suite 200	In the second of the second se
City State Zip Code	184082.00
Marletta GA 30064	Transaction IO : SE-852497  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Category/	10 19 2016
Name of Federal Candidate Support Off	fice Sought: House District: 00
Donald J. Trump	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Dis 20	sbursement For: Primary  General  Other (specify) ►
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
(b) SUBTOTAL of Uniternized Independent Expenditures	to the second secondary
(c) TOTAL Independent Expenditures	to the same of the same transfer of the same transf
Under penalty of perjury I certify that the independent expenditures reported herein were not rewith, or at the request or suggestion of, any candidate or authorized committee or agent of eith party committee) any political party committee or its agent.	made in cooperation, consultation, or concert her, or (if the reporting entity is not a political
Kelly C. Word  Date	10 25 2016 1
Signature	a . I to a second

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 23 OF 23 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In:Full)	FEC IDENTIFICATION NUMBER V
DCCC	C c00000935
Check if 24-hour report 46-hour report New report Amends report lile	d ou [n. n], [n. a], [Lana, Art.]
Full Name of Payee	Date of Public Distribution/Dissemination
Moore Campaigns, LLC	10 28 2016
Mailing Address 447 Irving St, NW	Amount
City State Zip Code	4472.36
Washington DC 20010	Transaction ID: SE-954234  Date of Disbursement or Obligation
Purpose of Experiditure Mail Services  Category/ Type  Type	10 27 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
Maria Maria	President Senate State:
Calendar Year-To-Date Per Etection for Office Sought  A59358B.81  2016	pursoment For: Primary General  Other (specify) >
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media LLC	10 28 2016
Mailing Address 222 W Ontario St	Amount
Suite 600	locate : du e' infer alemainealant pre land
City State Zip Code	30525.00
Chicago IL 60654	Transaction ID: SE-953928 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Category/ Type	10 28 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Celendar Year-To-Date Per Election for Office Sought  Disb 2010	ursement For: Primary Seneral  Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	34997.36
(b) SUBTOTAL of Unitemized Independent Expenditures	The state of the s
(c) TOTAL Independent Expenditures	1588663.16
Under penalty of perjury I cortify that the independent expenditures reported herein were not m with, or at the request or suggestion of, any candidate or authorized committee or agent of either perty committee), any political party committee or its agent.	ade in cooperation, consultation, or concert or, or (if the reporting entity is not a political
Date j	10 29 2016
Signature	

## Image# 201610319037014651 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

(Schedule E)	PAGE 7 OF 8 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C c00000935
Check if	ou nary , pap , hadaya
Full Name of Payee	Date of Public Distribution/Dissemination
Adelstein & Associates LLC Date of Dissemination: 10/31/16	10 31 2016
Mailing Address 222 West Ontario Street, Suite 600	Amount
City State Zip Code	800,00,00
Chicago IL 60654	Transaction ID: SE-954371 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  004	10 28 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disbute 4979620.65  2016	ursement For: Primary 🗶 General  Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
Adelstein & Associates LLC Date of Dissemination: 10/31/16	10 31 2016
Mailing Address 222 West Ontario Street, Suite 600	Amount
City State Zip Code	67387.50
Chicago IL 60654	Transaction ID : SE-954372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  004	M 10
Name of Federal Candidate Support Office	e Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disb. 2016	ursement For: Primary X General Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	147387.50
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	73-1-70
Under penalty of perjury I certify that the independent expenditures reported herein were not moved with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
Ward, Kelly, C., [Electronically Filed] Date	0 31 2016
Signature	tion to the state of the state

24/48 HOUR REPORT OF INDEPENDER (Schedule E)	NT EXPEND	ITURES		PAGE 51 OF 52
·			<del></del>	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			] (	FEC IDENTIFICATION NUMBER V
			1	C C00000935
Check if 24-hour report 248-hour report	New rep	ont Amends repo	ort filed on	22 T B W Y Y Y Y
Full Name of Payer Screen Strategies Media, LLC			i	Public Distribution/Dissemination
Date of Dissemination: Mailing Address 11150 Fairlax Blvd	10/18/16			10 18 2016
Suite 505			Amoun	
City	State	Zip Code	—·-[	134898.50
Fairlex	VA	22030	Transa Date of	ction ID : SE-952377 f Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	v.	10 11 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	Presider	1000
Calendar Year-To-Date Per Election for Office Sought	. 20	613000.20	l 2016	For: Primary K General ner (specify).
Full Name of Payee			Date of	Public Distribution/Dissemination
Kully Hall, LLC  Oate of Dissemination:	10/19/18	·		
			<b></b>	10 18 2016
Mailing Address 1932 1st Ave, Suite 203			Amoun	1 .
City	State	Zip Code		6225,00
Seattle	· WA	98101	Transac Date of	tion ID: SE-952379 Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	42.5	18 2016
Name of Federal Candidate	<del></del>	Support	Office Sought:	House District: 00
Donald J. Trump		X: Oppose	X: Presider	il Senate State:
Calendar Year-To-Date Per Election for Office Sought	, '1	2613000.20	2010	For: Primary General
		<del></del>	<del></del>	
(a) SUBTOTAL of Itemized Independent Expenditu	res	***************************************	·· <b>&gt;</b>	141123.50
(b) SUBTOTAL of Uniternized Independent Expend	litures	~45;444;********************************	" <b>&gt;</b>	
(c) TOTAL Independent Expenditures	***************************************	,		
•	·		<u> </u>	· · · · · · · · · · · · · · · · · · ·
Under penalty of perjury I cartify that the independ with, or at the request or suggestion of, any candid party committee) any political party committee or its	late or authorized			
Kelly C. Ward		D	10	19 2016
Signature		_ Date		

24/48 HOUR REPORT OF INDEPENDEN	T EXPEND	ITURES		
(Schedule E)				PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	<u> </u>	·		
DCCC	••			FEC IDENTIFICATION NUMBER V
				C C00000935
				v 0 B C · + + 1 4
Check if 24-hour report 48-hour report	X New rep	ort , _1 Amends rep	ort filed	d on
Full Name of Payee	<del></del>	•		Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 1	0/24/16			10 24 2016
Mailing Address 11150 Fairfax Blvd			•	10 24 2010
Suite 505				Amount
City	State	Zip Code		45000.00
Fairfax	VA	22030		Transaction ID : SE-952072
Purpose of Expenditure	<del></del>	Colonard		Date of Disbursement or Obligation
Media Buy		Category/ Type 004		10 17 2016
Name of Federal Candidate		Support	Office	B Sought: House District:00
Donald J. Trump		X Oppose		President Senate State:
Colondor Vers To Date			Dieb	reampol For: Primary IV Goograf
Calendar Year-To-Date Per Election for Office Sought	, 36	53174,61	2016	Other (specify)
Full Name of Payee			<u></u>	Date of Public Distribution/Dissemination
AL Media LLC				
Date of Dissemination: 1	0/24/16			10 24 2016
Mailing Address 222 W Ontario St				Amount
Suite 600				191050 00
City	State II.	Zip Code 60654	ļ	131250.00 Transaction ID : SE-953187
Chicago	u. 			Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	•	Category/ Type 004		"10" 21" 2016" '
		<u> </u>	, <u>.</u>	
Name of Federal Candidate		Support	1	e Sought: House District:00
Donald J. Trump		X Oppose		President Senate State:
Calendar Year-To-Date			Dispu	ursement For: Primary X General
Per Etection for Office Sought	<b>3</b>	3653174.61	20.0	Other (specify)
(a) SUBTOTAL of Itemized Independent Expanditure	S.,,	.,	. •	176250.00
:				•
(b) SUBTOTAL of Unitermized Independent Expenditu	,res ,		·· •	
				• • •
(c) TOTAL Independent Expanditures			" ▶	, , ,
				· · · · · · · · · · · · · · · · · · ·
Under penalty of perjury I certify that the independe	nt expenditures	reported herein were	not ma	ade in cooperation, consultation, or concert
with, or at the request or suggestion of, any candida	le or authorized	committee or agent of	elihe lo	r, or (il the reporting entity is not a political
party committee) any political party committee or its :	ayent.			
Kelle C. Wurd	•		,	w ran v y v v
Signature		Date	: 1	0 25 2016
Gigliatore				

24/48 HOUR REPORT OF INDEPE	NDENT EXPEN	DITURES	.1	DIAS AS
Schedule E)				PAGE 52 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			SEC ID	ENTIFICATION NUMBER V
DCCC				
			C	C00000935
Check if 24-hour report 48-hour rej	nort X New n	eport Amends rep	ort filed on	9 C 4 V 4
Full Name of Payes	<del></del>	<del></del>	Date of Public	Distribution/Olssemination
	C ination: 10/25/16		10	<b>25</b> 2016
Mailing Address 11150 Fairfax Blvd				
Suite 505			Amount	
City	State	Zip Code	<del></del>	64326.00
Fairfax .	VA	22030	Transaction II	D : SE-953184 rsement or Obligation
Purpose of Expenditure Media Buy	•	Calegory/ Type 004	10	21 2016
Name of Federal Candidate		f Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	President	Senate State:
			Disbursement For:	<del></del>
Catendar Year-To-Date Per Election for Office Sought		4359947.93	2016	
	<u> </u>		; Other (spe	
Full Name of Payee Buying Time, LLC	• .		Date of Public	Distribution/Dissemination
Date of Dissemi	hation: 10/25/16		10 ``	25 2016
Mailing Address 650 Massachusetts Aver	nue, NW		Ameura	•
Suite 210			Amount	
City	State	Zip Code		62488.00
Washington	DC	20001	Transaction ID Date of Disbut	: SE-953185 rsement or Obligation
Purpose of Expenditure Media Buy	•	Category/ Type 004	"10"	21 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump	-	X Oppose	1	Senato State:
Calendar Year-To-Date Per Election for Office Sought		4369947.93	2016	Primary Seneral
		<u> </u>	Other (spe	
(a) SUBTOTAL of Itemized Independent Exp	enditures		· •	126814.00
(b) SUBTOTAL of Unitermized Independent,	Expenditures	00 to 20 0 to 20 0 to 10 0 10 0 10 0 10 0 10 0 0 0 0 0 0 0 0	•	
(c) TOTAL Independent Expenditures	,,	•	· <b>▶</b>	,
. Under penalty of perjury I certify that the Inwith, or at the request or suggestion of, any party committee) any political party committee	candidate or authorize	es reported herein were ed committee or agent o	not made in cooperation feither, or (if the report	on, consultation, or concert ting ontity is not a political
Kelly C. Ward			· · · · · · · · · · · · · · · · · · ·	- y <b>y</b> 4
Signature		. Date	10 25	2016
3- min.c				

24/48 HOUR REPORT OF INDEPENDENT EXPENDIT	URES	. <del></del>
(Schedule E)		PAGE 8 OF 8
		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In full)		FEC IDENTIFICATION NUMBER ▼
DCCC		C C00000935
, or	•	
Check II 24-hour report 48-hour report New report	Amends report fi	led on
Full Name of Payee		Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/31/16		10 31 2016
Mailing Address 11150 Fairfax Blvd		
Suite 505		Amount
City State Z	ip Code	55000.00
Fairfax · VA 2	2030	Transaction ID : SE-953293  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Category/ Type 004	10 25 2016
Name of Federal Candidate		
,	901	fice Sought:   House District: 00
Donald J. Trump		President Senate State:
Calendar Year-To-Date	Dis	sbursement For: Primary X General
Per Election for Office Sought	3620.65	Other (specify)
Full Name of Payee		Date of Public Distribution/Dissemination
AL Media LLC		
Date of Dissemination: 10/31/16		10" 31" 2016
Mailing Address 222 W Ontario St		Amount
Suite 600		
City State Z	ip Code	115875.00
Chicago IL (	50654	Transaction ID : SE-954178  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Category/ 004 Type	10" 27" 2016
Name of Federal Candidate	Support Of	fice Sought: House District: 00
Donald J. Trump		X; President Senate State:
	n:	churcement For: 1 Primary Y General
	1979620.65	116 Otner (specify) >
, , ,		. : Other (specily) ▶
(a) SUBTOTAL of Itemized Independent Expenditures		170875.00
(b) SUBTOTAL of Uniterrized Independent Expenditures		
(a) and to the or ormanized independent expenditures	······································	•
(c) TOTAL Independent Expenditures		
fol Lawe unobeliated exhausingles-in-in-in-in-in-in-in-in-in-in-in-in-in-		433711.75
Under penalty of perjury I certify that the independent expenditures re with, or at the request or suggestion of, any candidate or authorized coparty committee) any political party committee or its agent.	ported herein were not ommittee or agent of eill	made in cooperation, consultation, or concert her, or (if the reporting entity is not a political
Ketty C. Ward		" " 5 2 . 4 3
ا د ممانه مسعد بر	Date	ີ 10 ວ່າ 2016
Signature		

Image# 201611049037121060	
24/48 HOUR REPORT OF INDEPENDENT	<b>EXPENDITURES</b>
(Schedule E)	

Sc	chedule E)	PAGE 10 OF 11 FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
Ch	neck if 🗷 24-hour report 🗌 48-hour report 📗 K New report 🗌 Amends report file	ed on MTM / DOD / VUYAV-V
	Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination
	Mailing Address 11150 Fairfax Blvd	Amount
	Suite 505	- Company
	City State Zip Code Fairfax · VA 22030	Transaction ID : SE-954176  Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy  Category/ Type  004	10 27 2016
	Name of Federal Candidate Support Office	ce Sought: House District: 00
	Trump, Donald, J.,	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought  Dis 201	bursement For: Primary General  Other (specify)
	Full Name of Payee AL Media LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination
	Mailing Address 222 W Ontario St	Amount
	Suite 600	Amount
	City State Zip Code Chicago iL 60654	3750.00 Transaction ID : SE-954988 Date of Disbursement or Obligation
	Purpose of Expenditure . Category/ Media Buy . Category/ Type 004	11 04 2016
	Name of Federal Candidate Support Office	ce Sought; House District: 00
	Trump, Donald, J., ,	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought  Dis 201	bursement For: Primary R General    6
	(a) SUBTOTAL of Itemized Independent Expenditures	43750.00
	(b) SUBTOTAL of Unitemized Independent Expenditures	
,	(c) TOTAL Independent Expenditures	
,	Under penalty of perjury I certify that the independent expenditures reported herein were not rewith, or at the request or suggestion of, any candidate or authorized committee or agent of elth party committee) any political party committee or its agent.	nade in cooperation, consultation, or concert er, or (if the reporting entity is not a political
	Ward, Kelly, C [Electronically Filed] Date	11 04 2016
	Signature	

Ward, Kelly, C., ,

Signature

	ge# 201611049037121059 48 HOUR REPORT OF INDEI	PENDENT EXPENDI	TURES		
	hedule E)				PAGE 9 OF 11
NA	ME OF COMMITTEE (In Full)	<del></del>	<del></del>	<del></del>	FOR SE OF FORM 24/48
	CCC			FEC	DENTIFICATION NUMBER V
Ĺ		·		C	C00000935
Che	ack if X 24-hour report 48-hour	report New repo	ort Amends repo	ort filed on	LAST LAST THE
ł	Full Name of Payee Screen Strategies Media, L Date of Diss	LC emination: 11/04/16	•	fu tag	lic Distribution/Dissemination
ı	Mailing Address 11150 Fairfax Blvd			11 1	04 2016
}	Suite 505			Amount	
ŀ	City	State	Zip Code		13000.00
	Fairfax	, Siale VA	22030	Transaction Date of Dist	ID : SE-954882 pursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004		03 2016
Ī	Name of Federal Candidate	<del></del>	Support	Office Sought:	House District: 00
	Trump, Donald, J., ,	· · · · · · · · · · · · · · · · · · ·	<b>⋉</b> Oppose	x President	Senale State:
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursement For: 2016 Other (s	Primary   General   pecify)   ■
	Full Name of Payee The New Media Firm, Inc.			Date of Pub	lic Distribution/Dissemination
ŀ	Adams - Addan	emination: 11/04/16	<del></del>	11	04 2016
}	Mailing Address 1730 Rhode Island A Suite 213	ve., nvv		Amount	
ľ	City	State	Zip Code		46000.00
	Washington	DC	20036		D: SE-954883 cursement or Obligation
1	Purpose of Expenditure Media Buy	•	Category/ 004	11	03 2016
İ	Name of Federal Candidate	<del></del>	Support	Office Sought:	House District: 00
	Trump, Donald, J., ,		K Oppose	★ President	Senate State:
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursement For: 2016 Other (s	Primary X General
(	subtotal of Itemized Independent	Expenditures	******************************		59000.00
0	b) SUBTOTAL of Uniternized Independe	nt Expenditures	afort 235217170000000000000000000000000000000000	. P	
(	c) TOTAL Independent Expenditures	,		· b	
w	nder penalty of perjury I certify that the lith, or at the request or suggestion of, a arty committee) any political party comm	any candidate or authorized	reported herein were committee or agent o	not made in coopers 1 either, or (if the rep	ation, consultation, or concert porting entity is not a political

[Electronically Filed]

2016

:04

Image# 201612089039916524

## SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

EMIZED INDEPENDENT EXPENDITURES	•					024 OF 109107 24 OF FORM 3X
MAME OF COMMITTEE (In Full)	•			FEC		ION NUMBER ¥
DCCC				С	C0000093	•
						<u>.                                    </u>
Check II 24-hour report : 48-hour report	New rep	oil Amends repo	ort filed	on 	·	
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/07/16 - 24 hours prior to	alactima day	, Memo	Kem			n/Dissemination
Mailing Address 1/1150 Fairfax Blvd	election day			11	07*	2016
Suite 505			]	Amount		
City	l' State	Zip Code				38173.50
Fairfox	VA	22030		Transaction Date of Disb		
Rupose of Expenditure Media Buy		Category/ Type (104		11	01	201 <u>8</u>
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump. Donald, J., ,		* Oppose	×	President	Senale	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	Disbu 2016	rsement For: Other (s	; ; Prma pecily) >	
Full Name of Payee The New Media Firm, Inc.		· Memo	Itern .	4	ic Distribution	VDissemination
Date of Dissemination: 11/01/16  - Mailing Address (720 Chada Island Aug. 2011)	<del></del>			11	01	2016
1730 Knode Island Ave., NAV				Amount		
Suite 213	State	Zip Code				3566.00
Washington	DC	20036		Transaction Date of Disb		643
Purpose of Expenditure Media Production		Category/ Type 004		111		2016
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Donald, J., ,		x. Oppose	×	President	Scnate	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	Disbui 2016	•		y 💢 General
	1 1	<u>-</u>	<u> </u>	Other (s	pecify) ▶	<del></del>
(a) SUBTOTAL of itemized independent Expenditures	i	5 2	• •			41739.50
(a) SUBTOTAL of Unitemized Independent Expenditu	1 <b>62 )</b>	1442. 1.11. 1 1441.11.11.11.11	. •		•	
(a) TOTAL Independent Expenditures		18 E-+024P07	•		•	ì
Under penalty of perjury I certify that the independence with, or at the request or suggestion of, any candid party committee) any political party committee or its	ate or authorized	reported herein were committee or agent of	not ma	ide in coopera , or (if the rep	ation, consult porting entity	ation, or concert is not a political
•	/Electronicully Fil	<i>led)</i> Date	e 12	2 08	20	)16
Signature						

	48 HOUR REPORT OF INDEPEND hedule E)	ENT EXPE	NDITURES		PAGE 5	
	ALE OF COMMITTEE'M. F. III			<del></del>		OF FORM 24/48
	ME OF COMMITTEE (IN Full) CCC			i F	EC IDENTIFICA	TION NUMBER Y
		•		. (	C C00000935	5
Cho	eck if 24-hour report 248-hour report	X New	report Amends rep	nort filed on	ń . u .	
П	Full Name of Payee			Date of	Public Distribution	on/Dissemination
	Screen Strategies Media, LLC.  Date of Dissemination	on: 10/18/16		1 11	o" 18	2016
	Malling Address 11150 Fairfax Blvd			Amount		
- 1	Suite 505			A		
Ī	City	State	Zip Code			134898.50
Ì	Fairfax	VA	22030	Transac Date of	tion ID.: SE-952 Disbursament or	377 Obligation
ſ	Purpose of Expenditure Media Buy	<del></del>	Category/ Type 004	, u	и <b>5</b> е	2016
- }.						
- [	Name of Federal Candidate		Support	Office Sought:	House	District: 00
ŀ	Donald J. Trump		∑ Oppose ⋅	X President	Senate	State:
Ī	Calendar Year-To-Date		2613000.20	Disbursement F	or: Prima	ry 💢 General
[	Per Election for Office Sought	- 1	;	2016 Othe	er (specify) 🕨	· 
1	Full Name of Payes			Date of	Public Distributio	on/Dissemination
- 1	Kully Hall, LLC  Date of Dissemination	on: 10/18/16	:	j "10	, , , , , , , , , , , , , , , , , , ,	2016
1	Mallian Address	311. 10/10/10		i ''	J 10	2016
ł	maning Address 1932 1st Ave, Suite 203			Amouni		
ı	City	State	Zip Code			6225.00
	Seattle	WA	98101	Transacti Date of	ion ID : SE-9523 Disbursement or	79 Obligation
	Purpose of Expenditure Media Buy Media Production		Category/ Typo		) 18	2016
- [	Name of Federal Candidate	······································	· Support	Office Sought:	House	District: 00
1	Conald J. Trump		X. Oppose	X; President	•	State:
ľ	Calendar Year-To-Date Per Election for Office Sought	•	2613000.20	2016	or: Prima	ry X General
		وصيد بين بين سيند بسير				
	a) SUBTOTAL of Itemized Independent Expend	situres		··· <b>&gt;</b>		141123-50
١.			÷	•		
•	b) SUBTOTAL of Unitermized Independent Expo	anditures		··· <b>&gt;</b>		
(	c) TOTAL Independent Expenditures	***************************************	•••••••••••••••••••••••••••••••••••••••	··· •		
v	Under penalty of perjury I certify that the indeprivith, or at the request or suggestion of, any car arry committee) any political party committee or	ndidate or authori	res reported herein were ized committee or agent	not made in coo of either, or (if the	peration, consult reporting entity	lation, or concert is not a political
	Kelly C. Ward		<b></b>	. بر ر. 10 ه	19 20	316
	Signature	* * 154 C. (DES ET	Date	e 10		, <u>.</u>

Image# 201610139032426300 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 3 OF 3
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC	FEC IDENTIFICATION NUMBER Y
	C c00000935
Check if 24-hour report 48-hour report New report Amends report	t filed an
Full Name of Payee Buying Time, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/11/16	10 11 2016
Mailing Address 650 Massachusetts Avenue, NW Suite 210	Amouni
City State Zip Code	57500,00
Washington DC 20001	Transaction ID : SE-951439 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Catogory/ Type	10 11 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Trump, Donald, J., ,	X President Senate State:
	Disbursoment For: Primary  General 2016  Giner (cpocily)
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC	
Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 11150 Fairfex Blvd .	Amount
Suite 505	for and a structure for freeze and
City State Zip Code	74632.00
Fairfax VA 22030	Transaction ID : SE-951438  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  1004	10 11 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Trump, Donald, J., Oppose	President Senato State:
Calendar Year-To-Date Per Election for Office Sought 1534583.62	Disbursoment For: ☐ Primary   Goneral  Other (specify)   ☐
(a) SUBTOTAL of Itemized Independent Expenditures	132132.00
(b) SUBTOTAL of Unitemized Independent Expenditures	b I was a series of the series
(c) TOTAL Independent Expenditures	170032.00
Under penalty of perjury I certify that the independent expenditures reported herein were new with, or at the request or suggestion of, any candidate or authorized committee or agent of party committee) any political party committee or its agent.	
Ward, Kelly, C., .   [Electronically Filed]   Data	10 , 13 , 2016
Signature Date	4 10 1 1 2010

	48 HOUR REPORT OF IND hedule E)	EPENDENT EXPEND	DITURES	- 1	PAGE 17 OF 17
	<u> </u>	·			FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full) CCC				ENTIFICATION NUMBER V
					C00000935
Che	eck if 24-hour report 48-ho	our report New re	port Amends rep	ort filed on	FOFE CHYPY YOU
	Full Name of Payee Screen Strategies Media,			Date of Public	Distribution/Dissemination
ł	Mailing Address 11150 Fairfax Blvd	issemination: 10/20/16	<del></del>	_ 10 '	20 2016
-	Suite 505	· -		Amount	ر عب على ال الله الله الله الله الله الله الله
Ī	Clty	State	Zip Code		107040.00
	Fairfax	. VA	22030	Transaction I Date of Disbu	D: SE-952389 rsement or Obligation
l	Purpose of Expenditure Media Buy	;	Category/ Type 004	10	18 2016
. [	Name of Federal Candidate		Support	Office Sought:	House District: 00
- [	Donald J. Trump		Oppose	President	Senate State:
	Calendar Year-To-Date Per Election for Office Sought	2 2 9,	989611.20	Disbursement For: 2016 Other (spe	Primary Seneral
	Full Name of Payee AL Media LLC Date of Di	ssemination: 10/20/16		1	Distribution/Dissemination
	Mailing Address 222 W Ontario St		<del></del>	Amount	
L	Suite 600				manifes of no modern is the ed.
	City Chicago	State	Zip Code 60854	Transaction ID	
ŀ	Purpose of Expenditure		T	Dete of Disbu	rsement or Obligation
	Media Buy		Category/ 004		2016
	Name of Federal Candidate		Support	Office Sought:	House District: 00
L	Donald J. Trump	<u>:</u>	∑i Oppose	X President	Senate State:
	Calendar Year-To-Date Per Election for Office Sought	Frankrije.	2989611.20	Disbursement For: 2016 Other (spe	Primary General
(;	a) SUBTOTAL of Itemized Independent	nt Expenditures		•	247290.00
(1	b) SUBTOTAL of Unitemized Indepen	dent Expenditures	Page 2007   Page 201	· <b>&gt;</b>	- 4
(4	c) TOTAL Independent Expenditures.			· <b>&gt;</b> ,	652070.38
w	inder penalty of perjury I certify that I ith, or at the request or suggestion of arty committee) any political party con	I, any candidate or authorized	s repurted herein were d committee or agent o	not made in cooperation of either, or (if the rapor	on, consultation, or concert rting entity is not a political
	Kelly C. Wurd		Oate	ສຸນ <b>ເພ</b> ະ 10 - 21	, , , , , , , , , , , , , , , , , , ,
	Signature				

24/48 HOUR REPORT OF INDEPENDENT EX	PENDITURES	PAGE 15 OF 15
(Schedule E)		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER ▼
DCCC		C c00000935
Check if 24-hour report 48-hour report	New report Amends repor	t filed on
Full Name of Payee		Date of Public Distribution/Dissemination
Prism Communications, Inc.  Date of Dissemination: 10/27/16	<b>;</b>	10 27 2016
Malling Address 1000 Potomac Street, NW		
Suite 420		Amount
City State	Zip Code	3291.58
Washington DC	20007	Transaction ID : SE-953927  Date of Olsbursement or Obligation
Purpose of Expenditure Media Production	Category/ Type 004	10 26 2016
Name of Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	Oppose	President Senato State:
Calendar Year-To-Date	and the second second	Disbursement For: Primary   Reneral
Per Election for Office Sought	4550355.45	2016 Other (specify) ▶
Full Name of Payee		Date of Public Distribution/Dissemination
76 Words Corp.  Date of Dissemination: 10/26/16	•	the second of the second of the second
AA-11- A 44	·	10 26 2016
1151 357 31, 1877		Amount
Floor#1	7-0-4-	EE00.00
City State Washington DC	Zip Code 20001	Transaction ID : SE-954171 Date of Disbursement or Obligation
Purpose of Expenditure	Category/ 004	TO SERVICE OF STREET
Media Production	Type 004	10 27 2016
Name of Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	. iX Oppose	President Senate State:
Calendar Year-To-Date		Disbursement For: Primary XI General 2016
Per Election for Office Sought	4436718.92	Other (specify) >
•		
(a) SUBTOTAL of Itemized Independent Expenditures		8791.58
		* * * * * * * * * * * * * * * * * * *
(b) SUBTOTAL of Unitemized Independent Expenditures	######################################	
		The same of the sa
(c) TOTAL Independent Expenditures	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	771178.77
		4 م 2 المستقد مقام مقام المستقد مقام
Under penalty of perjury I certify that the independent exp	enditures reported herein were r	not made in cooperation, consultation, or concart
with, or at the request or suggestion of, any candidate or a party committee) any political party committee or its agent.	uthorized committee or agent of	either, or (If the reporting entity is not a political
Keily C. Ward		_A. 411 \ .P
	Date	10 27 2016
Signature		

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 22 OF 25
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C' C00000935
Check if 24-hour report 48-hour report New report Amends report filed	I on
Full Name of Payee Kully Hall, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 1932 1st Ave, Suite 203	+ = -
	Amount
City State Zip Code Seattle WA 98101	4297.00 Transaction ID : SE-951665
Purpose of Expenditure Media Buy Media Production  Category/ Type	Date of Disbursement or Obligation
Name of Federal Candidate Support Office	B Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disbu 2016	ursement For: Primary X General  Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 1730 Rhode Island Ave., NW	
Suite 213	Amount
City State Zip Code	56930.43
Washington DC 20036	Transaction ID : 8E-951668  Date of Disbursement or Obligation
Purpose of Expenditure  Media Buy  Category/ Type  G04	10 12 2016
Name of Federal Candidate Support Office	e Sought: House Olstrict: 00
Donald J. Trump Signature Oppose Signatu	President Senato State:
Calendar Yoar-To-Date Per Election for Office Sought Disbut 2016	
3 d. 7 % as 1 7 when -4 7 7	Other (specily) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	61227.43
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	American A. J. Hay and the control of the control o
Under penalty of perjury I certify that the independent expenditures reported herein were not may with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	
Kelly C. Ward	Wall of the transfer of the tr
Signature Date 1	0 14 7 2016 7

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(Schedule E)	ZNVENI EXPENDI			PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				C C00000935
Check if 24-hour report # 48-hour	report New repo	ort Amends repo	rt filed on	1 10.00 1 km. Ar. Ar. Ar.
Full Name of Payee The New Media Firm, Inc.	emination: 10/12/16	•	5.00	Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Ave			Amount	0 12 2016
City	State	Zip Code	— : · · · · ·	4047.25
Washington	DC	20036		ction ID: SE-951654 Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type		0 12 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Trump, Donald, J., ,		X Oppose	★ President	t Senate State:
Calendar Year-To-Date Per Election for Office Sought		1721688.30	Disbursement 2016 Oth	For: Primary General or (specify)
Full Name of Payee Screen Strategies Media, LLC Date of Disse	) emination: 10/12/16		المالية المالية المالية المالية المالية المالية المالية المالية المالية المالية المالية المالية المالية المالية	Public Distribution/Dissemination  0 12 2016
Mailing Address 11150 Fairfax Blvd Suite 505			Amoun	tend Serviced Services (CV)
City	State	Zip Code		121850.00
Fairfax	VA	22030	Transac Date of	tion ID : SE-951660 Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004		0 12 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Trump, Donald, J., ,			× Presider	t Senate State:
Calendar Year-To-Date Per Election for Office Sought		1721688.30	Disbursement 2016	
(e) SUBTOTAL of Itemized Independent	Expenditures	,	. D	125897.25
(b) SUBTOTAL of Unitermized Independent	nt Expenditures	200 IM \$0 Pt 00 20 daren 2014 no no 10 Pt	· • [	
(c) TOTAL Independent Expenditures		***************************************	· > [	
Under penalty of perjury I certify that the with, or at the request or suggestion of, a party committee) any political party comm	ny candidate or authorized			
Ward, Kelly, C., ,			("u")"u" / "	ָּאָרְאָיִיִּעְיִייִּאָרִי זְיִיּאָרִי זְּאָרִייִּעְיִייִּ
Signature	[Electroni	cally Filed) Date	10	14 2016

Image# 201610189033039655

(Schedule E)	PENDENI EXPEND	IIUKES		PAGE 21 OF 25 FOR SE OF FORM 24/48	
NAME OF COMMITTEE (In Full) DCCC				C C00000935	
Check If 24-hour report	report New rep	ort 🗷 Amends repo	ort filed on	0 14 2016	
Full Name of Payee The New Media Firm, Inc.	emination: 10/12/16		g W	Public Distribution/Dissemination	
Mailing Address 1730 Rhode Island Ave		<del></del>		10 12 2016	
Suite 213			Amoun	1	
City	State	Zip Code		4047.25	
Washington	. DC	20036		iction ID : SE-952372 f Disbursement or Obligation	
Purpose of Expenditure Media Buy Media Production		Category/ Type		10 2016	
Name of Federal Candidate		Support	Office Sought	: House District: 00	
Trump, Donald, J., ,		X Oppose	* Preside	nt Senate State:	
Calendar Year-To-Date Per Election for Office Sought	المنافعة الم	1856586.80	Disbursement 2016 Ot	For: Primary   General her (specify)	
Adollino Address	C emination: 10/12/16		<b>_</b>	1 Public Distribution/Dissemination	
Mailing Address 11150 Feirfax Blvd			Amour	it .	
Suite 505	State	Zip Code	<b> </b>	121850.00	
Fairfax	VA	22030		tion ID : SE-952373 Disbursement or Obligation	
Purpose of Expenditure Media Buy		Category/ Type 004		10 14 2016	
Name of Federal Candidate		Support	Office Sought	: House District: 00	
Trump, Donald, J., ,		<b>✗</b> Oppose	¥ Preside	nt Senate State:	
Calendar Year-To-Date Per Election for Office Sought		1856586.80	Disbursement 2016 O	For: Primary X General her (specify) ▶	
(a) SUBTOTAL of Itemized Independent	Expenditures			125897.25	
(b) SUBTOTAL of Unitemized Independent	ent Expenditures	94 4 5 9 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	· • [	and the second s	
(c) TOTAL Independent Expenditures			<b>•</b>	agus agussangun kyssengun ayussang sanapunsapunsapunsapunsapunsapunsapunsap	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.					
Ward, Kelly, C., ,	<i>[Electron</i>	ically Filed] Date	M" "" / T	18 2016	
Signature		_ · · · · ·	ا مستر ا	إماريتكا الماضم	

-	/48 HOUR REPORT OF INDEPENDENT EX	(PENDI	TURES		PAGE 3 OF 3	
(S 	chedule E)				FOR SE OF FORM 24/48	
	AME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER	▼
	OCCC				C C00000935	
ō	neck If 24-hour report 🔀 48-hour report 🕏	New repo	ort Amends repo	rt filed on	Lm. 1 Long 1 LA MA; A	Y '!
	Full Name of Payee			1	of Public Distribution/Dissemination	
	Buying Time, LLC  Date of Dissemination: 10/11/10	6			10 11 2016	۲٦
	Mailing Address 850 Massachusetts Avenue, NW			Amou		1
	Suite 210			. دوه . عبر	عدالي بناء عيداً، سجاكت ما جعدالي، ماكيت ب. « « « «	
	City State		Zip Code	<u> </u>	57500,00 با خالف المدرز حيا ( ميدين عليس 11 جيات	1
	Washington DC		20001		action ID : SE-951439 of Disbursement or Obligation	
	Purpose of Expenditure Media Buy		Category/ 004	1	10 11 2016	
	Name of Federal Candidate		Support	Office Sough	it: House District: 00	-
	Donald J. Trump		Oppose	Preside	ent Senate State:	_
	Calendar Year-To-Oate Per Election for Office Sought	•	59931.62	Disbursement 2016 O	nt For: ☐ Primary 💢 Gener Hither (spocify) ▶	al
	Full Name of Payee			Date o	of Public Distribution/Dissemination	
	Screen Strategies Media, LLC Date of Dissemination: 10/12/10	6		Ţů	المارية من المارية المارية المارية المارية المارية المارية المارية المارية المارية المارية المارية المارية الم 10   12   12   10   10   10   10   10	77
	Mailing Address 11150 Fairfax Blvd				سيفسديما لمخسا المنس	4
	Suite 505			Amous	الله معرضة المحمدة المحمدة المحمدة الله	
	City State	<del></del>	Zip Code		74532.00	
-	Fairfax VA		22030		oction ID : SE-951438 of Disbursement or Obligation	,
	Purpose of Expenditure Media Buy		Category/ Type 004		10 11 2016	<u>.</u>
	Name of Federal Candidate		[ ] Support	Office Sough	it:   House District: 00	
i	Donald J. Trump		<b>◯</b> Oppose	Preside	ent Senate Stato:	_
	Calendar Year-To-Date Per Election for Office Sought	, .	1534563.62	Disbursement 2016 O	it For: Primary X Gener	āl
				_		
	(a) SUBTOTAL of Itemized Independent Expenditures	1-11,000	,	•	132132.00	'
	(b) SUBTOTAL of Uniternized Independent Expenditures	*************		<b>▶</b> <u>i</u>	e deserve l'e se ausse deserve l'account se administration d'u	
	(c) TOTAL Independent Expenditures	15000010017924100	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<b>&gt;</b> [	170032,00	
,	Under penalty of perjury I certify that the independent exposition of, any candidate or a party committee) any political party committee or its agent.	enditures ( :ulhorized	reported herein were a committee or agent of	not made in co l either, or (if t	coperation, consultation, or concer the reporting entity is not a politica	
	Kally C. Ward			25.41	13 2016	Í
	Signature		Date	10 }	13 2016	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES					
(Schedule E)	PAGE 50 OF 60 FOR SE OF FORM 24/48				
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER V				
DCCC	C c00000935				
	Maria de la composición della composición della				
Check if 24-hour report 348-hour report New report Amends report	t filed on				
Full Name of Payee	Date of Public Distribution/Dissemination				
Screen Strategies Media, LLC Date of Dissemination: 10/25/16	10 25 2016				
Mailing Address 11150 Fairfax Blvd	E. A. I landered broadenshind				
Suite 505	Amount				
City State Zio Code	121850.00				
Fairfax VA 22030	Transaction ID : \$E-952388  Oate of Disbursement or Obligation				
Purpose of Expenditure Media Buy  Category/ Type  O04	10 18 2016				
Name of Federal Candidate Support	Office Sought: House District: 00				
Donald J. Trump	President Senate State:				
Calendar Year-To-Date Per Election for Office Sought 4369947.93	Disbursement For:  Primary  General 2016  Other (specify) ▶				
Full Name of Payee	Date of Public Distribution/Dissemination				
Buying Time, LLC  Date of Dissemination: 10/25/16	10 25 2016				
Mailing Addross 650 Massachusetts Avenue, NW					
Suite 210	Amount				
City State Zip Code	19691.00				
Washington DC 20061	Transaction ID : SE-953229  Date of Disbursoment or Obligation				
Purpose of Expenditure Media Buy  Category/ Type  Category/ Type	10 24 7 2016				
Name of Federal Candidate Support	Office Sought: House District: 00				
Donald J. Trump Oppose	President Senate State:				
Calendar Year To-Date	Disbursement For:   Primary				
Per Election for Office Sought	2016 ☐ Other (specify) ▶				
(a) SUBTOTAL of Nemized Independent Expenditures	141541.00				
(b) SUBTOTAL of Uniternized Independent Expenditures	Take the second				
	The state of books washing				
(c) TOTAL Independent Expenditures	b and shorthern Committee of the				
Under penalty of perjury I certify that the independent expenditures reported herein were n with, or at the request or suggestion of, any candidate or authorized committee or agent of party committoo) any political party committee or its agent.					
Kelly C. Wurd	N 14 5 1 5 16 1 1 17 17 17 17 17 17 17 17 17 17 17 17				
Signature Date	10 25 2016				

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 57 OF 57
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC	FEC IDENTIFICATION NUMBER ▼
	C c00000935
Check If 24-hour report 48-hour report New report Amends report	filed on
Full Name of Payee Buying Time, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 11/01/16	11 01 2016
Mailing Address 650 Massachusetts Avenue, NW	Amount
Suite 210	
City State Zip Code Washington . DC 20001	17175.00 Transaction ID: SE-954373 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Cotogory/ Type  O04	10 28 2016
Name of Federal Candidate Support C	Office Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	Disbursement For: Primary General 016 Other (specify)
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/01/16	Date of Public Distribution/Olssemination
Mailing Address 11150 Fairfax BMd Suite 505	Amount
City State Zip Code	74850.00
Fairfax VA 22030	Transaction ID : 3E-954175  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  O04	10 27 2016
Name of Federal Candidate	Office Sought:   House District: 00
Donald J. Trump Č Oppose	President Senate State:
	Disbursement For: Primary ⊠ General 2016 Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	92025.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	14333615.05
Under penalty of perjury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of a party committee) any political party committee or its agent.	of made in cooperation, consultation, or concert either, or (ii the reporting entity is not a political
Kelly C, Ward	11 02 2016
Signature	THE PART OF THE PA

## Image# 201611069037127397 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES PAGE 11 OF 12 (Schedule E) FOR SE OF FORM 24/48 NAME OF COMMITTEE (In Full) FEC IDENTIFICATION NUMBER ▼ DCCC C00000935 Check if 🕱 24-hour report 🔲 48-hour report New report | Amends report filed on Full Name of Payee Date of Public Distribution/Dissemination Screen Strategies Media, LLC Date of Dissemination: 11/05/16 05 2016 Mailing Address 11150 Fairfax Blvd **Amount** Suite 505 City State Zip Code 58700.00 VA 22030 Transaction ID: SE-954453 **Fairfax** Date of Disbursement or Obligation Purpose of Expenditure Category/ Media Buy 004 10 31 2016 Туре Name of Federal Candidate 00 Support Office Sought: House District: \_ Trump, Donald, J.,, × Oppose ★ President Senate State: Disbursement For: **Primary** ₩ General Calendar Year-To-Date 2016 6526208.19 Per Election for Office Sought Other (specify) ▶ Full Name of Payee Date of Public Distribution/Dissemination Canal Partners Media, LLC Date of Dissemination: 11/06/16 06 2016 11 Mailing Address 25 Whitlock Place Amount-Suite 200 7910.00 State Zip Code City Transaction ID: SE-954884 GA 30064 Marietta Date of Disbursement or Obligation Purpose of Expenditure Category/ 004 2016 Media Buy 03 Type Name of Fedoral Candidate Office Sought: House 00 Support District: \_ Trump, Donald, J.,, Oppose ✗ President Senate State: **Primary** ¥ General Disbursement For: Calendar Year-To-Date 2016 6648199.19 Per Election for Office Sought Other (specify) ▶ (a) SUBTOTAL of Itemized Independent Expenditures..... 66610.00 (b) SUBTOTAL of Uniternized Independent Expenditures ....

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

(c) TOTAL Independent Expenditures.....

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Ward, Kelly, C., ,	[Electronically Filed]	Date	1.1	06	2016
Signature			المستنسسة	البيظسي	المدواسي معاومها

image# 201610189033039653 24/48 HOUR REPORT OF INDEPEN	DENT EXPEND	ITURES	p
(Schedule E)			PAGE 19 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			
DCCC			C C00000935
Check if 24-hour report × 48-hour report	nt New rep	ort 🗷 Amends repo	nt filed en 10 14 2016
Full Name of Payee Ralston Lapp Media, LLC Date of Dissemina	ation: 10/14/16		Date of Public Distribution/Dissemination
Mailing Address 1054 31st Street, NW Suite 430			Amount
City	State	Zip Code	12260.71
Washington	DC	20007	Transaction ID : SE-951677
Purpose of Expenditure Media Production		Category/ Type 004	Date of Disbursement or Obligation
Name of Federal Candidate		C Support	Office Sought: X House District; 23
Hurd, William,	·	Support Oppose	Office Sought: x House District: 23  President Senate State: TX
		г орросс	Disbursement For: Primary K General
Calendar Year-To-Date Per Election for Office Sought	المسائدة المسائدة المسائدة	1648833.65	2016 Other (specify)
Full Name of Payee			Date of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemina	stion: 10/14/18		10 14 2016
Mailing Address 650 Massachusetts Avenu	<del></del>		Amount
Suite 210			
City Washington	State - DC	Zip Code 20001	53000.00 Transaction ID : SE-952374 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10 13 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,		K Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	A - 8 - 63\ - 8 - 8 - (3)\	1919459.68	Disbursement For: Primary   General  Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expe	anditures	·	65260.71
(b) SUBTOTAL of Unitemized Independent E.	xpenditures	***************************************	
(c) TOTAL Independent Expenditures			
Under penalty of perjury I certify that the ind with, or at the request or suggestion of, any oparty committee) any political party committee	candidate or authorized	s reported herein were d committee or agent o	not made in cooperation, consultation, or concert f either, or (if the reporting entity is not a political
Ward, Kelly, C., .	[Electron	nically Filed  Date	10 18 2016
Signature	,		استصبا استسا استصد

## Image# 201610199033071490 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E) .	PAGE 52 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼  C C00000935
Check if 24-hour report	ed on wash , was , paragraph
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/18/16	Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Ave., NW Suite 213	Amount
City State Zip Code Washington DC 20036	3407.87 Transaction ID : SE-952382 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production  Category/ Type	10 ' 18 ' 2016 "
1	ce Sought: House District: 00  President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Dis 2613000,20  201	bursement For: Primary ☑ General  6 ☐ Other (specify) ▶
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/18/16	Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW Suite 210	Amount
City State Zip Code Washington DC 20001	7 33829.00 Transaction ID : SE-952073 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  O04	"10" ' "17" ' 2016
Town Boards I	ice Sought: House District: 00  President Senate State:
	bursement For: Primary   General  Other (specify)    Other
(a) SUBTOTAL of Itemized Independent Expenditures	87236.87
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures.	11152409.38
Under penalty of perjury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of eith party committee) any political party committee or its agent.	made in cooperation, consultation, or concert her, or (if the reporting entity is not a political
Ward, Kelly, C., , [Electronically Filed] Date	10 19 2016
Signature	entiment transformit

	48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 52 OF 60
(3	chedule E)	FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y
-	OCCC	C: c00000935
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	Full Name of Payer Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
	Date of Oissomnation: 10/25/16	10 25 2016
	Mailing Address 11150 Fairfax Blvd	Amount
	Suite 505	
	City State Zip Code	64326.00 Transaction ID: SE-953184
	Fairfax VA 22030	Transaction ID: SE-953184  Date of Disbursement or Obligation
	Purpose of Expenditure  Media Buy  Category/ Type : 004	10 21 2016
	Name of Federal Candidate Support Of	fice Sought: House District: 00
	Donald J. Trump Oppose	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought  A369947.93  20	sbursement For: Primary
	Full Name of Payee	Date of Public Distribution/Dissemination
	Buying Time, LLC	
ì	Date of Dissemination: 10/25/16	10 25 2016
	Mailing Address 650 Massachusatts Avenue, NW	Amount
	Suite 210	I to a continuous and antimostical
	City State Zip Code Weshington DC 20001	62488.00 Transaction ID : SE-953185
- 1		Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy  Cotegory/ 1 004 Type	10 21 2016
	Name of Federal Candidate Support Of	flice Sought: House District: 00
	Donald J. Trump Oppose	President Senate State:
	Per Election for Office Sought 4369947.93 20	sbursemont For: Primary General
لــا	1, 1, 1, 4, 4, 2,	☐ Other (specify) ►
	(a) SUBTOTAL of Itemized Independent Expenditures	126814.00
	(b) SUBTOTAL of Unitemized Independent Expenditures	والمتعلقة والمتعلقية فيتعالينها فرداعتها
		the second secon
	(c) TOTAL Independent Expanditures	also to Milano a miliano a
•	Under penalty of portury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of eit party committee) any political party committee or its agent.	made in cooperation, consultation, or concert har, or (if the reporting entity is not a political
	Relly C. Ward	u: u : / ;
	Signature	10 25 2016
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